

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Unites States of America	:	Docket #: 1:05-cr-10184-GAO-1
v.	:	Motion for Permission for Defendant to Travel Out of District
Noel Neff	:	May 1, 2006

Motion for Permission for Defendant to Travel Out of District

The defendant through the undersigned counsel, respectfully request the honorable court for permission to travel to Newberry, Florida from May 7, 2006 up to May 10, 2006. The Defendant wishes to visit his mother as she is 85 years old and the Defendant is facing a 5 mandatory minimum year sentence as a possible outcome of trial He will be staying at the home of his Sister, Lillian Sanchez, at 23305 NW 53rd Lane, Newberry Florida 32669. Assistant United States Attorney Robert E. Richardson has been contacted and it is his position that he will defer to the recommendation of pretrial services. Undersigned had spoken to Pretrial services in Connecticut, Brandon Pirpoli the Officer supervising Mr. Neff allowed me to represent to the court that Mr. Neff has traveled to Florida in the past to successfully, and he has been in compliance with all his conditions of release. For all the above reason the undersigned request for the defendant to be allowed to travel to visit his relatives in Florida.

Respectfully submitted,

Noel Neff

By: /s/ Francis L. O'Reilly
Francis L. O'Reilly,
Fed. Bar No.: CT17505
87 Ruane Street
Fairfield, CT 06430
Phone: 203-319-0707
Fax: 203-319-0128
Email: Attflor@aol.com

CERTIFICATE OF SERVICE

I, Francis L. O'Reilly, do hereby certify that I delivered a copy the attached motion via first class mail, post prepaid to:

Robert E. Richardson, Esq.
United States Attorney's Office
1 Courthouse Way
Boston, MA 02210

Dated:

By: /s/ Francis L. O'Reilly
Francis L. O'Reilly